

US DISTRICT COURT PUERTO RICO

EMMETT CALDWELL

plaintiff

vs

STATE OF PUERTO RICO

DEPARTMENT OF VIVIENDA

MARTINEL GROUP, 911 TRLEPHONE OPERATOR

JOHN DOE 1-10( representing unknown defendant(s) attacked & tried to run plaintiff over State of Puerto Rico employees)

US DEPARTMENT OF HOUSEING. defendants

RECEIVED AND FILED

23-CV-1547 CVR

CLERK'S OFFICE USDC PR

2023 OCT 31 PM 1:50

Jurisdiction Title 42 US Code 1983 + 3601

1ST CAUSE OF ACTION

DEPARTMENT OF VIVIENDA

1 DEPARTMENT OF VIVIENDA KNEW OF THE PROBABILITY AND CERTAINTY OF DANGER OF SEVER HARM OR DEATH BY GANG IF PLAINTIFF CALLED POLICE TO NEMINOSO CANALES FAILED DUTY TO NOTIFY ME DUE TO NON PUERTO RICAN RACE ALIENAGE FACE SEX ORIENTATION VIOLATING T42 USC 3601

1A DEPT OF VIVIENDA FAILED DUTY OWED IN GROSS NEGLIGENCE RECKLESSLY IN DISREGARD OF PROBABLE HARMS DUTY TO WARN NOTIFY PLAINTIFF OF FORSEEABLE BEATING AND SEVERE INJURY'S PAIN OR DEATH BY GANGS IF PLAINTIFF CALLED POLICE TO NEMINOSO CANALS PUBLIC HOUSEING AS OCCURED 9/3/23

1B DEPT VIVIENDA FAILED DUTY TO NOTIFY PLAINTIFF OF PUBLIC HOUSEING REGULAMENTO OR RULE CUSTOM NEMINOSO CANALS GANG WOULD ATTACK AND OR KILL PLAINTIFF IF HE CALLED POLICE TO PUBLIC HOUSEING

1C PLAINTIFF WAS NOT WARNED OF RULE NOT TO CALL POLICE TO PUBLIC HOUSEING BY ALL DEFENDANTS RECKLESSLY MALISHOUSLY IN GROSS NEGLIGENCE BY POLICE CHIEF, VIVIENDA, POLICE DEPARTMENT, STATE OF PUERTO RICO AND PORT OF PUERTO RICO DUTY OWED PUERTO ALIENAGE SEX DISCRIMINATION STATEMENT WERE MADE BY VIVIENDA + STATE EMPLOYEES "THROW OUT GAY GRINGO"

1D ALL DEFENDANTS MALISHOUSLY RECKLESSLY CONCEALED KNOWLEDGE OF EXTREME DANGER OF GANG BEATING AND ATTACK DEATH IF POLICE CALLED TO NEMINOSO CANALES, BY PLAINTIFF

1E DEPT VIVIENDA, MARTENAL GROUP, STATE OF PUERTO RICO POLICE AND ALL DEFENDANTS KNEW OR SHOULD HAVE KNOWN OF PUBLIC HOUSEING CUSTOM UNWRITTEN OR WRITTEN REGLAMENTO AND NOTORIOUS FACT THAT IF YOU CALL POLICE TO PUBLIC HOUSEING THE GANG WILL ATTACK AND BEAT YOU AND OR TRY TO KILL PLAINTIFF DIRECT PROXIMATE CAUSE OF PLAINTIFFS SEVERE PAIN SUFFERING INJURY'S HUMILIATION SEVERE EXTREME EMOTIONAL DISTRESS HEADACHES AND DEATH THREATS VIOLATING TITLE 41 CIVIL RIGHTS ACT 1980

1F 1ST DAY IN NEMEOSIO CANALES PLAINTIFF WALKED BY MAINTENCE AREA, INSIDE FENCE A BLACK VIVIENDA SHIRTED EMPLOYEE STARED AT PLAINTIFF AND SAID "WE ARE GOING TO KICK YOU OUT OF HERE" AND THREW A HAND SIGN PLAINTIFF REPORTED EMPLOYEES THREAT TO OFFICE THAT FAILED DUTY OWED TO TAKE APPROPRIATE PREVENTIVE ACTION

1G A VIDEO SHOWING GANG ARRESTS AT NEMINOSO CANALES PLAYED AT POLICE HEADQUARTERS WHEN PLAINTIFF WENT TO POLICE HEADQUARTERS TO GET HELP APPROX SEPT 22 TO GO INTO NEMNIOSO CANALES TO RETRIVE SOME OF HIS POSSESSIONS AS PLAINTIFF HAS NO CAR AND POLICE WARNED PLAINTIFF NOT TO RETURN

2 PLAINTIFF IS CAUCASIAN AND WAS TARGETED BY VIVIENDA BLACK EMPLOYEE WHO 1ST DAY STATED WE ARE GOING TO KICK OUT GRINGO AS PLAINTIFF PASSED FENCED MAINTENCE AREA DEFENDANTS NOTIFIED FAILED TO PREVENT KICK OUT ATTACK BY VIVIENDA GANG SUFFERED DIRECTLY PROXIMATELY THERETO

2A PLAINTIFF WAS TOLD BY A AMERICAN FILMING POLICE EXITING POLICE HEADQUARTERS DAYS BEFORE THE

GANG ATTACK "NOW THE POLICE ARE CORRUPT AND WORK FOR DRUG DEALERS" HE STATED HE WAS FROM BOSTON AND HAD A WEBSITE

2B PLAINTIFF TOLD POLICEMAN AT POLICE HEADQUARTERS THE FOLLOWING DAYS WHAT THE AMERICAN SAID AND POLICE MAN SAD "YES THATS CORRECT" AND POINTED UPSTAIRS AT POLICE HEADQUARTERS BUILDING

3) ALL DEFENDANTS VIOLATED PLAINTIFFS CIVIL RIGHTS IN VIOLATION OF TITLE 42 US CODE 1983 1981 KKK ACT AND OTHER FEDERAL CAUSES OF ACTION CALLING PLAINTIFF GRINGO AND SENDING 2 CLIPBOARD NEMPLOYEES TO DEFICATE AND DISTURB PLAINTIFFS CANALES APT BLDG

4 ON SEPT 3 PLAINTIFF WAS SEVERELY BEATEN AFTER CALLING POLICE 635 PM TO NEMOISO CANALES APT 27 BLDG 2 PUBLIC HOUSEING TO REPORT BLACK (#1) 22 WITH AFRO ON BLUE WHITE MOTOR CYCLE THAT STALKED AND TRIED TO RUN PLAINTIFF OVER 9/1/23 & AFTER GANG ATTACK HIT PLAINTIFF IN FACE) BY BLACK GANG THAT KICKED IN PLAINTIFFS DOOR

5 PLAINTIFFS CALLED 911 POLICE A SECOND TIME AFTER SEEING GANG WITH CLUB RACEING UP TO PLAINTIFFS APARTMENT AND BREAKING DOOR DOWN 911 OPERATOR SAID HE WOULD NOTIFY POLICE OF GANG ATTACK THEN REFUSED TO SPEAK STAYING ON LINE LISTENING TO GANG LOUDLY KICK IN DOOR WITH BASE BALL BAT AND FEET

6 PLAINTIFF WAS TOLD BY POLICE 6:45 PM AFTER THE REASON PLAINTIFF WAS BEATEN IS DUE TO" THEREBIS A REGULAMENTO POLICE CANNOT GO IN PUBLIC HOUSEING AND RESIDENTS CANNOT CALL POLICE"

7 PLAINTIFF REALIZED DURING GANG ATTACK THE DIRECT PROXIMATE CAUSE WAS PLAINTIFF HAD CALLED POLICE AFTER A BLACK ON SCOOTER LAUGHED INMEDIATE AFTER PLAINTIFF STOPPED TALKING TO POLICE TORRES 630 PM 9/3/23 AND 5 SCOTERS FOLLOWED PLAINTIFF TO HOS APT #2-27

8 DURING AND AFTER GANG ATTACK PLAINTIFF SHOUTED TO GANG "SORRY I DIDNT KNOW YOU CANT CALL POLICE" REPETED ALSO AFTER IN ST TO BLACK (#1) WHO THEN HIT PLAINTIFF IN FACE AFTER OLD GREYISH NEGRO SAID" DIE IF YOU CALL POLICE AGAIN

9 PLAINTIFF WAS AFTER AND DURING BEATEN ABLE TO EXIT AND ATTEMPTED TO WALK DOWN STAIRS BUT FELL ON CONCRETE DEBRI VIVIENDA WAS NOTIFIED OF BUT REFUSED TO CLEAN IN YEARS (exhibit) DIRECT PROXIMATE CAUSE OF SEVER INJURY S PLAINTIFF SUFFERED AND CONTINUES TO SUFFER

10 AFTER PLAINTIFF WAS ABLE TO ESCAPE MINUTES :WALKING TOWARDS POLICE HEADQUARTERS 360 FEET AWAY POLICE OFFICER TORRES WAS WAITING

11 PLAINTIFF WAS RESIDEING ON 54 BETRAM CENTRO CONVENCIONS WHEN SUED BY PORT OF PUERTO RICO IN CASE 23. AT HEARING PORT PRODUCED VIVIENDA OFFICALS AND UNDER DURESS PLAINTIFF FILLED OUT APPLICATION FOR PUBLIC HOUSEING DEMANDED

12 DOMINICANS AND PUERTO RICANS WORKING FOR PORT UNION AND PORT AND STATE OF PUERTO RICO S PLAIN CLOTHED POLICE PRIOR THREATENED TO KILL RAPE"WE ARE DRUNK AND GOING TO TEACH YOUTABOUT PENIS" REPETEDLY IN PATTERN OF HARASSMENT

12B CLAIM FOR RELIEF 10 MILLION DOLLARS AND APPROPRIATE REMEDIAL ORDERS



2ND CAUSE OF ACTION  
STATE OF PUERTO RICO

TITLE 42 USC 1983-1987

## CAUSE OF ACTION

13 STATE OF PUERTO RICO KNEW PLAINTIFF WOULD PROBERBLY BE ATTACKED BY PUBLIC HOUSEING GANG IF HE CALLED POLICE AND FAILED DUTY TO NOTIFY AND WARN PLAINTIFF DIRECT PROXIMATE CAUSE OF PLAINTIFF BEING ATTACKED 9/3/23 BY DRUG GANG AND FALLING DOWN STAIRCASE DUE TO DEBRI SEVERE PHYSICAL INJURY AND SEVERE EMOTIONAL DISTRESS NIGHTMARES AND BEING STALKED BY DRUG GANG AND DEATH THREATS

14 STATE OF PUERTO RICO ITS EMPLOYEES AGENTS GANGS AGENCY DISCRIMINATED AGAINST PLAINTIFF DUE TO NON PUERTO RICAN RACE ALIENAGE VIOLATED TITLE 42 USC 3601

15 DUE TO TO PLAINTIFFS ALIENAGE RACE WHITE SKIN ALSO HOMOSEXUALITY DEFENDANTS STATE OF PUERTO RICO UNIFORMED AND PLAINCLOTHED POLICE ALSO PORT EMPLOYEES CALLED PLAINTIFF MUCHACHA MUJER MERICONE PUTA GRINGO GO AFUERA, WE ARE GOING TO SACKA USTED VIOLATION OF TITLE 42 USC 1983 & 3601 ALSO PUERTO HOMOSEXUALITY UNDER COLOR OF LAW

16 DARK SKINNED STATE OF PUERTO POLICE FOR YEARS HAVE VERBALLY HARASSED PLAINTIFF IN PUBLIC PLACES MAKING HOMOSEXUAL INUENDOS VIOLATING TITLE 42 USC 1983

17 STATE OF PUERTO RICO A KNEW OF THE PROBABILITY AND CERTAINTY OF DANGER OF SEVER HARM OR DEATH BY GANG IF PLAINTIFF CALLED POLICE TO NEMINOSO CANALES

18 STATE OF PUERTO RICO FAILED DUTY OWED IN GROSS NEGLIGENCE RECKLESSLY IN DISREGARD OF PROBABLE HARMS DUTY TO WARN NOTIFY PLAINTIFF OF FORSEEABLE BEATING AND SEVERE INJURY PAIN OR DEATH BY GANGS IF PLAINTIFF CALLED POLICE TO NEMINOSO CANALS PUBLIC HOUSEING AS OCCURED 9/3/23

19 STATE OF PUERTO RICO FAILED DUTY TO NOTIFY PLAINTIFF OF PUBLIC HOUSEING REGULAMENTO OR RULE CUSTOM NEMINOSO CANALS GANG WOULD ATTACK AND OR KILL PLAINTIFF IF HE CALLED POLICE TO PUBLIC HOUSEING

20 PLAINTIFF WAS NOT WARNED OF RULE NOT TO CALL POLICE TO PUBLIC HOUSEING BY ALL DEFENDANTS RECKLESSLY MALISHOUSLY IN GROSS NEGLIGENCE BY POLICE CHIEF, VIVIENDA, POLICE DEPARTMENT, STATE OF PUERTO RICO AND PORT OF PUERTO RICO DUTY OWED

21 ALL DEFENDANTS MALISHOUSLY RECKLESSLY CONCEALED KNOWLEDGE OF EXTREEM DANGER OF GANG BEATING AND ATTACK DEATH IF POLICE CALLED TO NEMINOSO CANALES, BY PLAINTIFF

22 STATE OF PUERTO RICO POLICE AND ALL DEFENDANTS KNEW OR SHOULD HAVE KNOWN OF PUBLIC HOUSEING CUSTOM UNWRITTEN OR WRITTEN REGLAMENTO AND NOTORUOUS FACT THAT IF YOU CALL POLICE TO PUBLIC HOUSEING THE GANG WILL ATTACK AND BEAT YOU AND OR TRY TO KILL PLAINTIFF DIRECT PROXIMATE CAUSE OF PLAINTIFFS SEVERE PAIN SUFFERING INJURY HILMILATION SEVERE EXTREEM EMOTIONAL DISTRESS HEADACHES AND DEATH THREATS

23 1ST DAY IN NEMEOSIO CANALES PLAINTIFF WALKED BY MAINTENCE AREA, INSIDE FENCE A BLACK VIVIENDA SHIRTED EMPLOYEE STARED AT PLAINTIFF AND SAID "WE ARE GOING TO KICK YOU OUT OF HERE" AND THREW A HAND SIGN PLAINTIFF REPORTED EMPLOYEES THREAT TO OFFICE THAT FAILED DUTY OWED TO TAKE APPROPRIATE PREVENTIVE ACTION

24 A VIDEO SHOWING GANG ARRESTS AT NEMINOSO CANALES PLAYED AT POLICE HEADQUARTERS WHEN PLAINTIFF WENT TO POLICE HEADQUARTERS TO GET HELP APPROX SEPT 22 TO GO INTO NEMNIO SO CANALES TO RETRIVE SOME OF HIS POSSESSIONS AS PLAINTIFF HAS NO CAR AND POLICE WARNED PLAINTIFF NOT TO RETURN

25 PLAINTIFF IS CAUCASIAN AND WAS TARGETED BY VIVIENDA BLACK EMPLOYEE WHO 1ST DAY STATED WE ARE GOING TO KICK OUT GRINGO AS PLAINTIFF PASSED FENCED MAINTENCE AREA DEFENDANTS NOTIFIED FAILED TO PREVENT KICK OUT ATTACK BY VIVIENDA GANG SUFFERED DIRECTLY PROXIMATELY THERETO

26 STATE OF PUERTO RICO IS RESPONDANT SUPERIOR FAILED TO TRAIN SUPERVISE VIVIENDA POLICE AND PAINCLOTHED STATE EMPLOYEES DIRECT ON DUTY FOR STATES BENEFIT SEXUALLY EVIDENTIAL HARASS VIOLATION TUL CIVIL RIGHTS ACT 1964 UNDER COLOR OF LAWS

27 A PLAINTIFF WAS TOLD BY A AMERICAN FILMING POLICE EXITING POLICE HEADQUARTERS DAYS BEFORE THE GANG ATTACK "POLICE WORK FOR DOMINICAN GANG"



3) <sup>P.R.C.O</sup> STATE OF PUERTO VIOLATED PLAINTIFFS CIVIL RIGHTS IN VIOLATION OF TITLE 42 US CODE 1983 1981 KKK ACT AND OTHER FEDERAL CAUSES OF ACTION CALLING PLAINTIFF GRINGO AND SENDING 2 CLIPBOARD NEMPLOYEES DEFICATE AND DISTURB PLAINTIFFS CANALES APT BLDG

) PLAINTIFF CALLED POLICE 635 TO NEMINISO CANALES 9/3/23 TO REPORT ATTEMPTED RUN OVER AND STALKING BY 22 YEAR OLD BLACK SKINNED NEGRO ON BLUE WHITE MOTORCYCLE WHO HAD PRIOR GUN POPE IT WHEN PASSING NEMINOSO CANALES BLDG 2 APT 27 ON DAY OF MOVE IN AND SINCE

) AFTER POLICE LEFT AND GANG STALKED AND ATTACKED PLAINTIFF CALLED AGAIN AND 911 OPERATOR EXPLAINED POLICE JUST LEFT AND NEED TO RETURN AS GANG KICKING DOWN DOOR 911 OPERATOR WAS TALKING TO PLAINTIFF SEVERAL MINUTES REFUSED TO CALL POLICE TO RETURN AFTER HEARING GANG KICKING IN DOOR

) PLAINTIFF WAS SEVERELY BEATEN BY GANG AND SUFFERED FALL INJURY'S DIRECT PROXIMATE DUE TO 911 OPERATOR MALISHOUS RACEIST REFUSAL TO TELL POLICE TO RETURN TO APT 27 BLDG 2 NEMINISO CANALES

) OPERATER KNEW PLAINTIFF WAS NOT PUERTO RICAN AND DUE TO ALIENAGE RACE DISCRIMINATION REFUSED TO NOTIFY POLICE OF GANG ATTACK WHICH POLICE TORRES WAS WAITING 500 FEET AWAY ANTICIPATEING GANG. RETALATION FOR PLAINTIFF CALLING POLICE AS ONE GANG MEMBER LAUGHED AS 6 GANG SCOOTERS WATCHED LISTENED FROM 20 FEET AWAY AS PLAINTIFF MADE COMPLAINT TO TORRES

) HENIOUS AGGREGIOUS UNCIVILIZED NOT TO BE TOLERATED IN CIVILIZED SOCIETY WARRANTING PUNETIVE DAMAGES IS 911 TELEPHONE OPERATORS PATTERN OF HANGING UP DURING EMERGENCY 911 CALLS

) STATE OF PUERTO RESPONDANT SUPERIOR FAILED DUTY TO PROPERLY TRAIN AND SUPERVISE 911 OPERATORS POLICE AND VIVIENDA TO PREVENT ACTS COMPLAINED IN GROSS RECKLESS AND FOREKNOWLDGE OF PROBABLE HARMS

) ALL DEFENDANTS VIOLATED PLAINTIFFS CIVIL RIGHTS IN VIOLATION OF TITLE 42 US CODE 1983 1981 KKK ACT AND OTHER FEDERAL CAUSES OF ACTION CALLING PLAINTIFF GRINGO AND SENDING 2 CLIPBOARD NEMPLOYEES TO DEFICATE AND DISTURB PLAINTIFFS CANALES APT BLDG

4 ON SEPT 3 PLAINTIFF WAS SEVERELY BEATEN AFTER CALLING POLICE 635 PM TO NEMOISO CANALES APT 27 BLDG 2 PUBLIC HOUSEING TO REPORT BLACK (#1) 22 WITH AFRO ON BLUE WHITE MOTOR CYCLE THAT STALKED AND TRIED TO RUN PLAINTIFF OVER 9/1/23 & AFTER GANG ATTACK HIT PLAINTIFF IN FACE) BY BLACK GANG THAT KICKED IN PLAINTIFFS DOOR

5 PLAINTIFFS CALLED 911 POLICE A SECOND TIME AFTER SEEING GANG WITH CLUB RACEING UP TO PLAINTIFFS APARTMENT AND BREAKING DOOR DOWN 911 OPERATOR SAID HE WOULD NOTIFY POLICE OF GANG ATTACK THEN REFUSED TO SPEAK STAYING ON LINE LISTENING TO GANG LOUDLY KICK IN DOOR WITH BASE BALL BAT AND FEET

6 PLAINTIFF WAS TOLD BY POLICE 6:45 PM AFTER THE REASON PLAINTIFF WAS BEATEN IS DUE TO "THEREBIS A REGULAMENTO POLICE CANNOT GO IN PUBLIC HOUSEING AND RESIDENTS CANNOT CALL POLICE"

7 PLAINTIFF REALIZED DURING GANG ATTACK THE DIRECT PROXIMATE CAUSE WAS PLAINTIFF HAD CALLED POLICE AFTER A BLACK ON SCOOTER LAUGHED INMEDIATE AFTER PLAINTIFF STOPPED TALKING TO POLICE TORRES 630 PM 9/3/23 AND 5 SCOTERS FOLLOWED PLAINTIFF TO HOS APT #2-27

8 DURING AND AFTER GANG ATTACK PLAINTIFF SHOUTED TO GANG "SORRY I DIDNT KNOW YOU CANT CALL POLICE" REPETED ALSO AFTER IN ST TO BLACK (#1) WHO THEN HIT PLAINTIFF IN FACE AFTER OLD GREYISH NEGRO SAID "DIE IF YOU CALL POLICE AGAIN

9 PLAINTIFF WAS AFTER AND DURING BEATEN ABLE TO EXIT AND ATTEMPTED TO WALK DOWN STAIRS BUT FELL ON CONCRETE DEBRI VIVIENDA WAS NOTIFIED OF BUT REFUSED TO CLEAN IN YEARS (exhibit) DIRECT PROXIMATE CAUSE OF SEVER INJURY'S PLAINTIFF SUFFERED AND CONTINUES TO SUFFER

10 AFTER PLAINTIFF WAS ABLE TO ESCAPE MINUTES :WALKING TOWARDS POLICE HEADQUARTERS 360 FEET AWAY POLICE OFFICER TORRES WAS WAITING

17 CLAIM FOR RELIEF A ORDER STATE OF PUERTO PAY FOR PLAINTIFFS SECURITY GUARD 24 HOURS 7 DAYS A WEEK AND \$1,000,000.00 CIVIL COMPENSATION FOR THERAPY , GANG PROOF SECURE HOUSEING AND \$2,000,000.00 PUNETIVE DAMAGES AND APPROPRIATE RELIEFS



) PLAINTIFF CALLED POLICE 635 TO NEMINISO CANALES 9/3/23 TO REPORT ATTEMPTED RUN OVER AND STALKING BY 22 YEAR OLD BLACK SKINNED NEGRO ON BLUE WHITE MOTORCYCLE WHO HAD PRIOR GUN POPED IT WHEN PASSING NEMINOSO CANALES BLDG 2 APT 27 ON DAY OF MOVE IN AND SINCE

) AFTER POLICE LEFT AND GANG STALKED AND ATTACKED PLAINTIFF CALLED AGAIN AND 911 OPERATOR EXPLAINED POLICE JUST LEFT AND NEED TO RETURN AS GANG KICKING DOWN DOOR 911 OPERATOR WAS TALKING TO PLAINTIFF SEVERAL MINUTES REFUSED TO CALL POLICE TO RETURN AFTER HEARING GANG KICKING IN DOOR

) PLAINTIFF WAS SEVERELY BEATEN BY GANG AND SUFFERED FALL INJURYS DIRECT PROXIMATE DUE TO 911 OPERATOR MALISHOUS RACEIST REFUSAL TO TELL POLICE TO RETURN TO APT 27 BLDG 2 NEMINISO CANALES

) OPERATER KNEW PLAINTIFF WAS NOT PUERTO RICAN AND DUE TO ALIENAGE RACE DISCRIMINATION REFUSED TO NOTIFY POLICE OF GANG ATTACK WHICH POLICE TORRES WAS WAITING 500 FEET AWAY ANTICIPATEING GANG RETALATION FOR PLAINTIFF CALLING POLICE AS ONE GANG MEMBER LAUGHED AS 6 GANG SCOOTERS WATCHED LISTENED FROM 20 FEET AWAY AS PLAINTIFF MADE COMPLAINT TO TORRES VIOLATING TITLE 42 US CODE 1983-81 UNDER COLOR OF LAW CUSTOM DUE TO FAILURE TO PROPERLY TRAIN SUPERVISE

) HENIOUS AGGREGIOUS UNCIVILIZED NOT TO BE TOLERATED IN CIVILIZED SOCIETY WARRANTING PUNITIVE DAMAGES IS 911 TELEPHONE OPERATORS PATTERN OF HANGING UP DURING EMERGENCY 911 CALLS

) STATE OF PUERTO RESPONDANT SUPERIOR FAILED DUTY TO PROPERLY TRAIN AND SUPERVISE 911 OPERATORS POLICE AND VIVIENDA TO PREVENT ACTS COMPLAINED IN GROSS RECKLESS AND FOREKNOWLWDGE OF PROBABLE HARMS TO PREVENT 911 OPERATORS VIOLATING TITLE 42 US CODE 1983 CALLING PLAINTIFF DUE TO NON PUERTORICAN ALIENAGE REFUSED TO CONTACT POLICE 2ND 911 CALL

) ALL DEFENDANTS VIOLATED PLAINTIFFS CIVIL RIGHTS IN VIOLATION OF TITLE 42 US CODE 1983 1981 KKK ACT AND OTHER FEDERAL CAUSES OF ACTION CALLING PLAINTIFF GRINGO AND SENDING 2 CLIPBOARD NEMPLOYEES TO DEFICATE AND DISTURB PLAINTIFFS CANALES APT BLDG

4 ON SEPT 3 PLAINTIFF WAS SEVERELY BEATEN AFTER CALLING POLICE 635 PM TO NEMOISO CANALES APT 27 BLDG 2 PUBLIC HOUSEING TO REPORT BLACK (#1) 22 WITH AFRO ON BLUE WHITE MOTOR CYCLE THAT STALKED AND TRIED TO RUN PLAINTIFF OVER 9/1/23 & AFTER GANG ATTACK HIT PLAINTIFF IN FACE) BY BLACK GANG THAT KICKED IN PLAINTIFFS DOOR

5 PLAINTIFFS CALLED 911 POLICE A SECOND TIME AFTER SEEING GANG WITH CLUB RACEING UP TO PLAINTIFFS APARTMENT AND BREAKING DOOR DOWN 911 OPERATOR SAID HE WOULD NOTIFY POLICE OF GANG ATTACK THEN REFUSED TO SPEAK STAYING ON LINE LISTENING TO GANG LOUDLY KICK IN DOOR WITH BASE BALL BAT AND FEET

6 PLAINTIFF WAS TOLD BY POLICE 6:45 PM AFTER THE REASON PLAINTIFF WAS BEATEN IS DUE TO" THEREBIS A REGULAMENTO POLICE CANNOT GO IN PUBLIC HOUSEING AND RESIDENTS CANNOT CALL POLICE"

7 PLAINTIFF REALIZED DURING GANG ATTACK THE DIRECT PROXIMATE CAUSE WAS PLAINTIFF HAD CALLED POLICE AFTER A BLACK ON SCOOTER LAUGHED IMMEDIATE AFTER PLAINTIFF STOPPED TALKING TO POLICE TORRES 630 PM 9/3/23 AND 5 SCOTERS FOLLOWED PLAINTIFF TO HOS APT #2-27

8 DURING AND AFTER GANG ATTACK PLAINTIFF SHOUTED TO GANG "SORRY I DIDNT KNOW YOU CANT CALL POLICE" REPETED ALSO AFTER IN ST TO BLACK (#1) WHO THEN HIT PLAINTIFF IN FACE AFTER OLD GREYISH NEGRO SAID" DIE IF YOU CALL POLICE AGAIN

9 PLAINTIFF WAS AFTER AND DURING BEATEN ABLE TO EXIT AND ATTEMPTED TO WALK DOWN STAIRS BUT FELL ON CONCRETE DEBRI VIVIENDA WAS NOTIFIED OF BUT REFUSED TO CLEAN IN YEARS (exhibit) DIRECT PROXIMATE CAUSE OF SEVER INJURYS PLAINTIFF SUFFERED AND CONTINUES TO SUFFER

10 AFTER PLAINTIFF WAS ABLE TO ESCAPE MINUTES :WALKING TOWARDS POLICE HEADQUARTERS 360 FEET AWAY POLICE OFFICER TORRES WAS WAITING

11 PLAINTIFF WAS RESIDEING ON 54 BETRAM CENTRO CONVENCIONS WHEN SUED BY PORT OF PUERTO RICO IN CASE 23. AT HEARING PORT PRODUCED VIVIENDA OFFICALS AND UNDER DURESS PLAINTIFF FILLED OUT APPLICATION FOR PUBLIC HOUSEING DEMANDED

12 DOMINICANS AND PUERTO RICANS WORKING FOR PORT UNION AND PORT AND STATE OF PUERTO RICO S PLAIN CLOTHED POLICE PRIOR THREATENED TO KILL RAPE"WE ARE DRUNK AND GOING TO TEACH YOU BOUT PENIS" REPETEDLY IN PATTERN OF HARASSMENT



HOUSEING AND URBAN DEVELOPEMENT HEREAFTER REFERED TO AS HUD PROVIDES FUNDS FOR STATE OF PUERTO RICO PUBLIC HOUSEING KNEW OR SHOULD HAVE KNOWN PLAINTIFF WOULD BE GANG ATTACKED IF HE CALLED POLICE TO NEMIOSO CANALES

) PLAINTIFF CALLED POLICE 635 TO NEMINISO CANALES 9/3/23 TO REPORT ATTEMPTED RUN OVER AND STALKING BY 22 YEAR OLD BLACK SKINNED NEGRO ON BLUE WHITE MOTORCYCLE WHO HAD PRIOR GUN POPLD II WHEN PASSING NEMINOSO CANALES BLDG 2 APT 27 ON DAY OF MOVE IN AND SINCE

) AFTER POLICE LEFT AND GANG STALKED AND ATTACKED PLAINIFFF CALLED AGAIN AND 911 OPERATOR EXPLAINED POLICE JUST LEFT AND NEED TO RETURN AS GANG KICKING DOWN DOOR 911 OPERATOR WAS TALKING TO PLAINTIFF SEVERAL MINUTES REFUSED TO CALL POLICE TO RETURN AFTER HEARING GANG KICKING IN DOOR

) PLAINTIFF WAS SEVERELY BEATEN BY GANG AND SUFFERED FALL INJURYS DIRECT PROXIMATE DUE TO 911 OPERATOR MALISHOUS RACEIST REFUSAL TO TELL POLICE TO RETURN TO APT 27 BLDG 2 NEMINISO CANALES

) OPERATER KNEW PLAINTIFF WAS NOT PUERTO RICAN AND DUE TO ALIENAGE RACE DISCRIMINATION REFUSED TO NOTIFY POLICE OF GANG ATTACK WHICH POLICE TORRES WAS WAITING 500 FEET AWAY ANTICIPATEING GANG RETALATION FOR PLAINTIFF CALLING POLICE AS ONE GANG MEMBER LAUGHED AS 6 GANG SCOOTERS WATCHED LISTENED FROM 20 FEET AWAY AS PLAINTIFF MADE COMPLAINT TO TORRES

) HENIOUS AGGREGIOUS UNCIVILIZED NOT TO BE TOLERATED IN CIVILIZED SOCIETY WARRANTING PUNETIVE DAMAGES IS 911 TELEPHONE OPERATORS PATTERN OF HANGING UP DURING EMERGENCY 911 CALLS

) STATE OF PUERTO RESPONDANT SUPERIOR FAILED DUTY TO PROPERLY TRAIN AND SUPERVISE 911 OPERATORS POLICE AND VIVIENDA TO PREVENT ACTS COMPLAINED IN GROSS RECKLESS AND FOREKNOWLWDE OF PROBABLE HARMS  
1 HUD FAILED TO PPROVIDE FUNDS TO PROVIDE SECURITY TO PREVENT HARRASEMENT THREATS AND ATTACK  
PLAINTIFF SUFFERED DIRECT PROXIMATE CAUSE OF PLAINTIFFS INJURYS

3) ALL DEFENDANTS VIOLATED PLAINTIFFS CIVIL RIGHTS IN VIOLATION OF TITLE 42 US CODE 1983 1981 KKK ACT AND OTHER FEDERAL CAUSES OF ACTION CALLING PLAINTIFF GRINGO AND SENDING 2 CLIPBOARD NEMPLOYEES TO DEFICATE AND DISTURB PLAINTIFFS CANALES APT BLDG

4 ON SEPT 3 PLAINTIFF WAS SEVERELY BEATEN AFTER CALLING POLICE 635 PM TO NEMOISO CANALES APT 27 BLDG 2 PUBLIC HOUSEING TO REPORT BLACK (#1) 22 WITH AFRO ON BLUE WHITE MOTORCYCLE THAT STALKED AND TRIED TO RUN PLAINTIFF OVER 9/1/23 & AFTER GANG ATTACK HIT PLAINTIFF IN FACE) BY BLACK GANG THAT KICKED IN PLAINTIFFS DOOR

5 PLAINTIFFS CALLED 911 POLICE A SECOND TIME AFTER SEEING GANG WITH CLUB RACEING UP TO PLAINTIFFS APARTMENT AND BREAKING DOOR DOWN 911 OPERATOR SAID HE WOULD NOTIFY POLICE OF GANG ATTACK THEN REFUSED TO SPEAK STAYING ON LINE LISTENING TO GANG LOUDLY KICK IN DOOR WITH BASE BALL BAT AND FEET

6 PLAINTIFF WAS TOLD BY POLICE 6:45 PM AFTER THE REASON PLAINTIFF WAS BEATEN IS DUE TO "THEREBIS A REGULAMENTO POLICE CANNOT GO IN PUBLIC HOUSEING AND RESIDENTS CANNOT CALL POLICE" HUD KNEW FAILED DUTY OWED TO WARN

7 PLAINTIFF REALIZED DURING GANG ATTACK THE DIRECT PROXIMATE CAUSE WAS PLAINTIFF HAD CALLED POLICE AFTER A BLACK ON SCOOTER LAUGHED IMMEDIATE AFTER PLAINTIFF STOPPED TALKING TO POLICE TORRES 630 PM 9/3/23 AND 5 SCOTERS FOLLOWED PLAINTIFF TO HOS APT #2-27

8 DURING AND AFTER GANG ATTACK PLAINTIFF SHOUTED TO GANG "SORRY I DIDNT KNOW YOU CANT CALL POLICE" REPETED ALSO AFTER IN ST TO BLACK (#1) WHO THEN HIT PLAINTIFF IN FACE AFTER OLD GREYISH NEGRO SAID "DIE IF YOU CALL POLICE AGAIN

9 PLAINTIFF WAS AFTER AND DURING BEATEN ABLE TO EXIT AND ATTEMPTED TO WALK DOWN STAIRS BUT FELL ON CONCRETE DEBRI VIVIENDA WAS NOTIFIED OF BUT REFUSED TO CLEAN IN YEARS (exhibit) DIRECT PROXIMATE CAUSE OF SEVER INJURYS PLAINTIFF SUFFERED AND CONTINUES TO SUFFER

10 AFTER PLAINTIFF WAS ABLE TO ESCAPE MINUTES WALKING TOWARDS POLICE HEADQUARTERS 360 FEET AWAY POLICE OFFICER TORRES WAS WAITING

17 CLAIM FOR RELIEF A ORDER HUD TO PAY FOR PLAINTIFFS SECURITY GUARD 24 HOURS 7 DAYS A WEEK AND \$1,000,000.00 CIVIL COMPENSATION FOR THERAPY, GANG PROOF SECURE HOUSEING AND \$2,000,000.00 PUNETIVE DAMAGES AND APPROPRIATE RELIEF

CAUSE OF ACTION MARTINEL GROUP

) MARTINEL GROUP WAS GROSS NEGLIGENT RECKLESS FOR FAILING DUTY OWED TO WARN PLAINTIFF OF FACT IT KNEW LIKELYHOOD OR CERTAINTY OF GANG ATTACK AND DEATH IF PLAINTIFF CALLED POLICE TO NEMOISO CANALES TO REPORT CRIME OF ATTEMPTED ASSAULT AS ADMINISTRATORS OF NE

) MARTINEL GROUP HAD PRIOR KNOWLEDGE OF LOCAL CUSTOM CALLING POLICE TO PUBLIC HOUSEING RAISES DANGER AND LIKELIHOOD PROBABILITY OF CALLER BEING ATTACKED BY GANG IN RETALATION

) MARTINEL FAILED DUTY TO TAKE REMEDIAL MEASURES INCREASE SECURITY AFTER BEING NOTIFIED THAT 1ST DAY A BLACK VIVIENDA EMPLOYEE THREATENED TO KICK PLAINTIFF OUT OF NEMNISO CANALES AND OF THE TALL BLACK AFRO MOTORCYCLIST GUN POPING AND CIRCLEING AFTER 6PM FRI SAT NIGHTS

) PLAINTIFF CALLED POLICE 635 TO NEMINISO CANALES 9 3 23 TO REPORT ATTEMPTED RUN OVER AND STALKING BY 22 YEAR OLD BLACK SKINNED NEGRO ON BLUE WHITE MOTORCYCLE WHO HAD PRIOR GUN POPED IT WHEN PASSING NEMINOSO CANALES BLDG 2 APT 27 ON DAY OF MOVE IN AND SINCE

) AFTER POLICE LEFT AND GANG STALKED AND ATTACKED PLAINTIFF CALLED AGAIN AND 911 OPERATOR EXPLAINED POLICE JUST LEFT AND NEED TO RETURN AS GANG KICKING DOWN DOOR 911 OPERATOR WAS TALKING TO PLAINTIFF SEVERAL MINUTES REFUSED TO CALL POLICE TO RETURN AFTER HEARING GANG KICKING IN DOOR

) PLAINTIFF WAS SEVERELY BEATEN BY GANG AND SUFFERED FALL INJURY'S DIRECT PROXIMATE DUE TO 911 OPERATOR MALISHOUS RACEIST REFUSAL TO TELL POLICE TO RETURN TO APT 27 BLDG 2 NEMINISO CANALES

MARTINEL GROUP KNEW OF THE PROBABILITY AND CERTAINTY OF DANGER OF SEVER HARM OR DEATH BY GANG IF PLAINTIFF CALLED POLICE TO NEMINOSO CANALES

FAILED DUTY OWED IN GROSS NEGLIGENCE RECKLESSLY IN DISREGARD OF PROBABLE HARMS DUTY TO WARN NOTIFY PLAINTIFF OF FORSEEABLE BEATING AND SEVERE INJURY'S PAIN OR DEATH BY GANGS IF PLAINTIFF CALLED POLICE TO NEMINOSO CANALS PUBLIC HOUSEING AS OCCURED 9 3 23

FAILED DUTY TO NOTIFY PLAINTIFF OF PUBLIC HOUSEING REGULAMENTO OR RULE CUSTOM NEMINOSO CANALS GANG WOULD ATTACK AND OR KILL PLAINTIFF IF HE CALLED POLICE TO PUBLIC HOUSEING

IC PLAINTIFF WAS NOT WARNED OF RULE NOT TO CALL POLICE TO PUBLIC HOUSEING BY ALL DEFENDANTS RECKLESSLY MALISHOUSLY IN GROSS NEGLIGENCE BY POLICE CHIEF, VIVIENDA, POLICE DEPARTMENT, STATE OF PUERTO RICO AND PORT OF PUERTO RICO DUTY OWED

ID ALL DEFENDANTS MALISHOUSLY RECKLESSLY CONCEALED KNOWLEDGE OF EXTREEM DANGER OF GANG BEATING AND ATTACK DEATH IF POLICE CALLED TO NEMINOSO CANALES, BY PLAINTIFF

MARTENAL GROUP, STATE OF PUERTO RICO POLICE AND ALL DEFENDANTS KNEW OR SHOULD HAVE KNOWN OF PUBLIC HOUSEING CUSTOM UNWRITTEN OR WRITTEN REGLAMENTO AND NOTORUOUS FACT THAT IF YOU CALL POLICE TO PUBLIC HOUSEING THE GANG WILL ATTACK AND BEAT YOU AND OR TRY TO KILL PLAINTIFF DIRECT PROXIMATE CAUSE OF PLAINTIFFS SEVERE PAIN SUFFERING INJURY'S HUMILIATION SEVERE EXTREEM EMOTIONAL DISTRESS HEADACHES AND DEATH THREATS

IF 1ST DAY IN NEMEOSIO CANALES PLAINTIFF WALKED BY MAINTENCE AREA INSIDE FENCE A BLACK VIVIENDA SHIRTED EMPLOYEE STARED AT PLAINTIFF AND SAID "WE ARE GOING TO KICK YOU OUT OF HERE" AND THREW A HAND SIGN PLAINTIFF REPORTED EMPLOYEES THREAT TO OFFICE THAT FAILED DUTY OWED TO TAKE APPROPRIATE PREVENTIVE ACTION

IG A VIDEO SHOWING GANG ARRESTS AT NEMINOSO CANALES PLAYED AT POLICE HEADQUARTERS WHEN PLAINTIFF WENT TO POLICE HEADQUARTERS TO GET HELP APPROX SEPT 22 TO GO INTO NEMNISO CANALES TO RETRIVE SOME OF HIS POSSESSIONS AS PLAINTIFF HAS NO CAR AND POLICE WARNED PLAINTIFF NOT TO RETURN

2 PLAINTIFF IS CAUCASIAN AND WAS TARGETED BY VIVIENDA BLACK EMPLOYEE WHO 1ST DAY STATED WE ARE GOING TO KICK OUT GRINGO AS PLAINTIFF PASSED FENCED MAINTENCE AREA DEFENDANTS NOTIFIED FAILED TO

(MARTINE) GROUP, KNEW OR SHOULD HAVE KNOW PLAINTIFFS CALLING POLICE TO NEMNOISO CANALES WOULD CAUSE GANG TO ATTACK MABY KILL PLAINTIFF



I DECLARE ABOVE FACTS PERSONALLY KNOWN SWORN UNDER OATH AND PENALTY OF PERJURY AND LAWS TRUE  
TO MY PERSONAL KNOWLEDGE

  
EMMETT CALDWELL AFFIANT

DATED 11/19/23

WHEREFORE

17 CLAIM FOR RELIEF A ORDER DEFENDANTS PAY FOR PLAINTIFFS SECURITY GUARD 24 HOURS 7 DAYS A WEEK  
AND \$1,000,000.00 CIVIL COMPENSATION FOR THERAPY , GANG PROOF SECURE HOUSEING AND \$2,000,000.00  
PUNETIVE DAMAGES AND APPROPRIATE RELIEFS

POB 16309

San Juan PR 00908

biz2dev777@gmail.com